



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SPN/PTH/KTF/VAZ

271 Cadman Plaza East  
Brooklyn, New York 11201

April 4, 2022

By Electronic Mail and ECF

The Honorable Pamela K. Chen  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Full Play Group, SA, et al.  
Criminal Docket No. 15-252 (S-3) (PKC)

Dear Judge Chen:

The government respectfully submits this letter pursuant to the Court’s order dated March 28, 2022, directing the government to “clarify whether it does not intend to pursue the wire fraud and wire fraud conspiracy charges relating to the CONCACAF Media and Marketing Rights Scheme against Full Play at trial.” Although Full Play’s owners, Hugo Jinkis and Mariano Jinkis, are charged in the CONCACAF Media and Marketing Rights Scheme set forth in Counts 39, 40, and 41 of the third superseding indictment, Full Play is not. Thus, the government does not intend to pursue any charges relating to the CONCACAF Media and Marketing Rights Scheme against Full Play at trial.

Respectfully submitted,

BREON PEACE  
United States Attorney

By: /s/  
 Samuel P. Nitze  
 Patrick T. Hein  
 Kaitlin T. Farrell  
 Victor A. Zapana  
 Assistant U.S. Attorneys  
 (718) 254-7000

cc: Counsel of record (by ECF)  
Clerk of Court (PKC) (by ECF)